

REMARKS/ARGUMENTS

Applicant thanks the Examiner for the opportunity of a telephone interview conducted on October 10, 2006. During the interview, applicant's representative pointed out that Gibson and Raviv, taken together into combination, do not disclose or suggest determining the identity of the home mobile telephony network based on the International Mobile Subscriber Identity (IMSI) of the visiting subscriber. The Examiner stated that Raviv discloses identifying the Mobile Station International Subscriber Directory Number (MSISDN). The Applicant's representative stated that the IMSI is not equivalent to the MSISDN. No agreement was reached. The foregoing will serve as Applicant's statement of the substance of the interview.

Claims 1-24 are the claims currently pending in the present application.

Claims 13 and 16 are amended to correct minor issues of style. There amendments are minor and are not believed to raise any new issues requiring further searching. Therefore, these amendments to the claims should be entered into the record at this time.

Rejection of Claims 1 and 11 under 35 U.S.C. § 103

Claims 1 and 11 are rejected under 35 U.S.C. § 103 as being obvious based on Gibson et al., U.S. Patent No. 6,775,249 and Raviv et al., U.S. Patent Application Publication No. 2002/0164983. Reconsideration of this rejection is respectfully requested.

Among the problems recognized and solved by Applicant's claimed invention is that an error message provided to a visiting mobile subscriber away from the subscriber's home mobile network sometimes needs to be selected or tailored based on the home network of the mobile subscriber. According to an aspect of applicant's claimed invention, the identity of the home mobile telephony network of the visiting subscriber is determined based on the International Mobile Subscriber Identity (IMSI) of the visiting subscriber, and the error message or text of the message that is sent in response to a dialing error pattern detected may be selected or determined in accordance with the home network of the visiting subscriber.¹ For example, according to an

¹This discussion of solutions provides exemplary applications of applicant's invention. Applicant does not represent that every embodiment of applicant's claimed invention necessarily

aspect of applicant's invention, the error messages to the subscriber may be customized depending on the home network, for example, whether a specific error message is sent or a more general message is sent may be determined based on whether there is an agreement between the network visited and the subscriber's home network, or the language in which the message is sent or other content of the message may be determined.

For at least the following reasons, Applicant's claimed invention is neither anticipated by nor obvious based on the cited art. By way of example, independent claims 1 and 11 require:

determining the identity of the home mobile telephony network based on the International Mobile Subscriber Identity of the visiting subscriber.

The cited art does not disclose or suggest this feature. As described, for example, at page 4 of Applicant's disclosure, the IMSI is made up of a string of digits, some of which identify the Mobile Country Code (MCC) and the Mobile Network Code (MNC) of the subscriber. The IMSI is not to be confused with the MSISDN (Mobile Station International ISDN Number), which is the public telephone number to dial to contact the mobile telephone (Applicant's disclosure, page 4, lines 1-8). The MSISDN does not identify the subscriber's home network and thus cannot be used for determining the identity of the home mobile telephony network.

Gibson discloses connection handling in a communication network such as POTS (Plain Old Telephone System) and certain type of error handling.

Gibson does not disclose or suggest error handling and notification for visiting subscribers in a visited mobile telephony network. Since Gibson does not disclose or suggest this feature, Gibson is incapable of disclosing or suggesting processing and IMSI or determining the identity of the home mobile telephony network based on the IMSI of the visiting subscriber.

Raviv does not cure the deficiencies of Gibson as they relate to independent claims 1 and 11. Raviv discloses supporting a data request by a roaming mobile telephone (Raviv, Abstract) and identifying a device based on the Mobile Station International Subscriber Directory Number (MSISDN) (Raviv, page 2, paragraph 23). Raviv discloses a system for optimal routing of WAP

embodies or performs every aspect of the solutions herein discussed.

data sessions over circuit switching networks to prevent subscribers in foreign networks roaming in the generic VPMN from having to establish data calls in the home network because of (1) inter-connection costs of an international circuit, and (2) in the international circuit switching network, the CLI is usually lost (that is, the MSISDN necessary in order to identify the subscriber to charged). Raviv tries to reroute WAP-CS calls to an international gateway located in the VPMN, which carries out the SS7-IP translation and which provides packet access to the home network from the visited network.

The system disclosed in Raviv is completely incompatible with Mobile Number Portability, which most of the national laws and regulations regulating wireless telephone networks require. Further, because of this incompatibility with Mobile Number Portability, Raviv's CLI-oriented system may be obsolete (it may have worked in the past, but its use may no longer make any sense in the real world), because CLI cannot guarantee that a specific subscriber belongs to this or that network operator.

Raviv does not disclose or suggest processing the International Mobile Subscriber Identity (IMSI). Further, since Raviv does not disclose or suggest this feature, Raviv is incapable of disclosing or suggesting determining the identity of the home mobile telephony network based on the IMSI of the visiting subscriber. That is, Raviv attempts to save the cost of having an international circuit busy for each WAP-CS session. Thus, Raviv discloses that the identification of the subscriber is done with the CLI, that is using the MSISDN, which does not at all identify the operator or home network to which the subscriber belongs. The voice call in Raviv is directed to the international gateway in the visited network and therefore the phone call is redirected using ISUP (a protocol for establishing calls over circuit switching in SS networks), in which for national connections the calling party number is sent (the content of which being the CLI, that is the calling MSISDN). Raviv does not disclose or suggest processing or sending the IMSI in any way. In fact, Raviv does not disclose or suggest determining the home public mobile network of the subscriber, let alone determining the home network based on the IMSI. Accordingly, Gibson and Raviv, even taken together in combination, do not disclose or suggest the recitations of independent claims 1 and 11.

Further, Gibson and Raviv, even taken together in combination, do not disclose or suggest the above-discussed problems recognized and solved by applicant's claimed invention. Therefore, it is respectfully submitted that the recitations of claims 1 and 11 would not have been obvious based on Gibson and Raviv.

Rejection of Claims 2-10 and 12-24 under 35 U.S.C. § 103

Claims 2-10 and 12-24 are rejected under 35 U.S.C. § 103 as being obvious from Gibson and Raviv in view of Lohtia et al., U.S. Patent Application Publication No. 2003/0211845. Reconsideration of this rejection is respectfully requested.

Claims 2-10 and 12-24 depend from independent claims 1 and 11, respectively. Lohtia does not cure the above-identified deficiencies of Gibson and Raviv as they relate to the above-discussed features of independent claims 1 and 11. Accordingly, claims 2-10 and 12-24 are patentably distinguishable over the cited art for at least the same reasons as their respective base claims.

Moreover, claim 4 requires an apparatus for selecting text for the short message text based on the identity of the home mobile telephony network. Further, claim 13 requires based on the identity of the home mobile telephony network of the visiting subscriber determining whether the visiting subscriber has the right to a dialing error notification service.


The cited art does not disclose or suggest determining home mobile telephony network of the visiting subscriber, let alone determining the home mobile telephony network based on the IMSI of the visiting subscriber. Further, the cited art does not disclose or suggest selecting text for the short message based on the identity of the home mobile telephony network, per claim 4, or determining whether the visiting subscriber has a right to a dialing error notification service, based on the identity of the home mobile telephony network of the visiting subscriber, as required by claim 13. Accordingly, the cited art does not disclose or suggest the recitations of claims 4 and 13.

In view of the foregoing discussion, allowance of the application is respectfully requested.

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on October 17, 2006:

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Name of applicant, assignee or
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Signature

October 17, 2006

Date of Signature

Respectfully submitted,


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